

May 29, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2d Floor
Boston, MA 02110

**RE: D.T.E. 02-25; Fitchburg Gas and Electric Light Company;
Electric Division Rate Request**

Dear Secretary Cottrell:

Enclosed for filing please find the Massachusetts Division of Energy Resources' ("DOER") Motion to Intervene in the above action.

Thank you for your attention.

Sincerely,

Carol R. Wasserman
Deputy General Counsel

enc.

cc: Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
ELECTRIC DIVISION RATE REQUEST**

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D.T.E. 02-25

**PETITION TO INTERVENE
ON BEHALF OF THE
COMMONWEALTH OF MASSACHUSETTS
DIVISION OF ENERGY RESOURCES**

The Division of Energy Resources of the Commonwealth of Massachusetts ("DOER") hereby petitions for leave to intervene and participate in the above-captioned proceeding.

In support of its request, DOER states the following:

1. DOER's name and address are as follows:

Commonwealth of Massachusetts
Division of Energy Resources
70 Franklin Street, 7th Floor
Boston, MA 02110

2. DOER is the Massachusetts executive agency responsible for establishing and implementing the Commonwealth's energy policies and programs, generally. (M.G.L. c. 25A, § 6).
3. Pursuant to M.G.L. c. 25A, § 6, DOER is authorized and directed to:
 - (1) plan, develop, oversee, and operate programs to help consumers understand, evaluate, and select retail energy supplies and related services offered as a consequence of electricity and gas utility restructuring;
 - (2) develop and administer programs relating to energy conservation, alternative energy development, non-renewable energy supply and resources development, energy bond authority, energy information and energy emergencies;

- (3) advise, assist, and cooperate with other state, local, regional, and federal agencies in developing appropriate program and policies relating to energy planning and regulation in the Commonwealth;
 - (4) develop energy data and information management capabilities to aid energy planning and decision-making; and
 - (5) promote the development of sound energy education programs.
- 4. DOER's ability to develop and implement consistent governmental policies with respect to the Commonwealth's energy programs will be substantially and specifically affected by this proceeding.
 - 5. DOER requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

Commonwealth of Massachusetts
Division of Energy Resources

By its attorney:

Carol R. Wasserman
Deputy General Counsel
Division of Energy Resources
70 Franklin Street, 7th Floor
Boston, MA 02110
Tel. (617) 727-4732

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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**FITCHBURG GAS AND ELECTRIC LIGHT COMPANY)
ELECTRIC DIVISION RATE REQUEST)**

D.T.E 02-25

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon all parties of record in this proceeding in accordance with the requirements of the Department's rules of practice and procedure as set forth at 220 C.M.R. §1.05(1).

Dated at Boston, Massachusetts this 29th day of May 2002.

Carol R. Wasserman
Deputy General Counsel
Massachusetts Division of
Energy Resources